

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-80088-CR-SMITH/MAYNARD

18 U.S.C. § 1349

18 U.S.C. § 1028A

18 U.S.C. § 1028(a)(7)

UNITED STATES OF AMERICA

vs.

JENNIFER WEGLOWSKI,

Defendant.

/

FILED BY _____ D.C.

MAY 18 2023

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FT. LAUD.

INDICTMENT

The Grand Jury charges that:

At all times material to this Indictment:

COUNT 1

**Conspiracy to Commit Bank Fraud
(18 U.S.C. § 1349)**

1. Citibank, N.A., was a financial institution with accounts insured by the Federal Deposit Insurance Corporation.
2. From on or about August 7, 2020, until on or about August 12, 2020, in Broward and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendant,

JENNIFER WEGLOWSKI,

did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and willfully execute and attempt to execute a scheme and artifice to defraud federally insured financial institutions and to obtain monies, funds, credits, assets, securities, and other property owned by and under the custody and control of these financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States

Code, Section 1344.

PURPOSE OF THE CONSPIRACY

3. It was the purpose of the conspiracy for defendant JENNIFER WEGLOWSKI and her co-conspirators to unjustly enrich themselves by using fraudulent driver's licenses to negotiate and attempt to negotiate checks in other people's names using the other people's personal identification information.

MANNER AND MEANS OF THE CONSPIRACY

4. Defendant JENNIFER WEGLOWSKI traveled from New York to South Florida to participate in a check cashing scheme.

5. After she arrived in South Florida, defendant JENNIFER WEGLOWSKI received checks and fraudulent driver's licenses in other people's names from co-conspirators and was instructed to cash the checks at banks.

6. Defendant JENNIFER WEGLOWKI would use fraudulent driver's licenses which contained her photograph and the personal identifying information of other individuals, to cash and attempt to cash checks written to the individuals whose names appeared on the driver's licenses.

7. On or about August 7, 2020, defendant JENNIFER WEGLOWSKI possessed a State of New York driver's license in S.H.'s name, with S.H.'s true name, date of birth, and address, but with defendant JENNIFER WEGLOWSKI's photograph and used that driver's license to cash, and attempt to cash, checks written to S.H.

8. On or about August 12, 2020, defendant JENNIFER WEGLOWSKI entered a Citibank branch in Palm Beach Gardens, Florida, and attempted to cash a check payable to S.L. using a fraudulent State of Florida driver's license in S.L.'s name, with S.L.'s true name, date of birth, and address, but with defendant WEGLOWSKI's photograph.

9. On or about August 12, 2020, defendant JENNIFER WEGLOWSKI entered another Citibank branch in West Palm Beach, Florida, and attempted to cash a \$4,000 check payable to S.L. using a fraudulent State of Florida driver's license in S.L.'s name, with S.L.'s true name, date of birth, and address, but with defendant WEGLOWSKI's photograph.

10. On or about August 12, 2020, defendant JENNIFER WEGLOWSKI possessed a fraudulent State of New York driver's license with S.H.'s name, address, and date of birth, but containing JENNIFER WEGLOWSKI's photograph, as well as a note with S.H.'s name, date of birth, social security number, address, cell phone number, and Personal Identification Number (PIN) for S.H.'s bank account at Citibank.

All in violation of Title 18, United States Code, Section 1349.

COUNT 2

(Aggravated Identity Theft - 18 U.S.C. § 1028A(a)(1))

On or about August 12, 2020, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

JENNIFER WEGLOWSKI,

during and in relation to a felony violation of Title 18, United States Code, Section 1349, conspiracy to commit bank fraud as charged in Count 1 of this Indictment, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is, the name, date of birth, and driver's license number of S.L., in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 3

(Identity Theft - 18 U.S.C. § 1028(a)(7))

On or about August 12, 2020, in Palm Beach County, in the Southern District of Florida,
and elsewhere, the defendant,

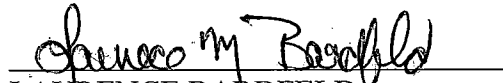
JENNIFER WEGLOWSKI,

did knowingly possess and use without lawful authority, a means of identification of another person, that is, the name, date of birth, driver's license number, and social security number of S.L., with the intent to commit, and to aid and abet, and in connection with, any unlawful activity that constitutes a violation of Federal law, that is, conspiracy to commit bank fraud, in violation of Title 18, United States Code, Section 1349, with such possession and use affecting interstate commerce, in violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

A TRUE BILL

FOREPERSON


MARKENZY LAPOINTE
UNITED STATES ATTORNEY


LAURENCE BARDFELD
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO.: _____

v.

Jennifer Weglowski
_____/

CERTIFICATE OF TRIAL ATTORNEY

Superseding Case Information:

New Defendant(s) (Yes or No) _____

Number of New Defendants _____

Total number of counts _____

Court Division (select one)

- ☐ Miami ☐ Key West ☐ FTP
☐ FTL ☒ WPB

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
List language and/or dialect: _____
4. This case will take 2-3 days for the parties to try.
5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)
I ☒ 0 to 5 days ☐ Petty
II ☐ 6 to 10 days ☐ Minor
III ☐ 11 to 20 days ☐ Misdemeanor
IV ☐ 21 to 60 days ☒ Felony
V ☐ 61 days and over
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) No
If yes, Magistrate Case No. _____
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of _____
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No
15. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No

By: _____

Laurence M. Bardfeld
LAURENCE M. BARDFELD

Assistant United States Attorney

FL Bar No. 0712450

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Jennifer Weglowski

Case No: _____

Count 1

Conspiracy to Commit Bank Fraud

18 U.S.C. § 1349

* **Max. Term of Imprisonment:** 30 years

* **Min. Term of Imprisonment:**

* **Max. Supervised Release:** 5 years

* **Max. Fine:** \$1,000,000

Count: 2

Aggravated Identity Theft

18 U.S.C. § 1028A

* **Max. Term of Imprisonment:** 2 years

* **Min. Term of Imprisonment:** 2 years

* **Max. Supervised Release:** 1 year

* **Max. Fine:** \$250,000

Count: 3

Identity Theft

18 U.S.C. § 1028(a)(7)

* **Max. Term of Imprisonment:** 5 years

* **Min. Term of Imprisonment:**

* **Max. Supervised Release:** 3 years

* **Max. Fine:** \$250,000

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.